

# EXHIBIT 6

**From:** [Ken Kim](#)  
**Sent:** Friday, October 16, 2020 6:29 PM  
**To:** [Acacia Dietz](#); [Barbara Bibas](#)  
**Cc:** [ESQ Edward ReBrook](#); [IDS\\_SINKS-02678](#)  
**Subject:** RE: Sines v Kessler – Discovery

Hi Acacia:

Please see my responses in red below.

Regards,  
Ken

Kenneth Kim  
Consultant, Discovery Services  
iDiscovery Solutions  
Mobile: [267.847.4876](tel:267.847.4876)



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**From:** Acacia Dietz <[acacia.dietz@outlook.com](mailto:acacia.dietz@outlook.com)>  
**Sent:** Friday, October 16, 2020 6:25 PM  
**To:** Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; Barbara Bibas <[bbibas@idsinc.com](mailto:bbibas@idsinc.com)>  
**Cc:** ESQ Edward ReBrook <[rebrooklaw@gmail.com](mailto:rebrooklaw@gmail.com)>; IDS\_SINKS-02678 <[ids\\_sinks-02678@idsinc.com](mailto:ids_sinks-02678@idsinc.com)>  
**Subject:** RE: Sines v Kessler – Discovery

[EXTERNAL SENDER]

Ken –

Thank you – Just for verification, the “A0107 – A0133 (various emails recently collected – highlighted above in green) – produced on or about 8/26/2020 as production volume NSM003” – this was produced to the Plaintiff’s for their review on or about 8-26-2020 – is this correct? **This is correct**

As for the items that iDS is unable to proceed on, I am looking into it, however, as of today we do not have any updated information to provide for those. **Understood**

Is there any update as to the forensic search of Mr. Colucci’s devices? **We are still performing 2<sup>nd</sup> level forensics investigation – we will provide you with report once completed.**

Thank you

**ACACIA DIETZ**  
Legal Assistant  
**THE REBROOK LAW OFFICE**  
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Email: [acacia.dietz@outlook.com](mailto:acacia.dietz@outlook.com)

immediately by telephone ([586.696.0385](tel:586.696.0385)) or by electronic mail ([acacia.dietz@outlook.com](mailto:acacia.dietz@outlook.com)) and delete this message and all copies and backups thereof. Thank you.

**From:** [Ken Kim](#)

**Sent:** Friday, October 16, 2020 8:03 AM

**To:** [Acacia Dietz](#); [Barbara Bibas](#)

**Cc:** [ESQ Edward ReBrook](#); [iDS\\_SINKS-02678](#)

**Subject:** RE: Sines v Kessler – Discovery

Hi Acacia:

Please find below excerpt for the NSM collections from the recent status report that was sent out this week:

iDS EID	Defendant	Requested Device/Account	Account User Name if Multiple	Date Device/Account Made Available	Collection Status	iDS
A0054	National Socialist Movement	Bitchute	nsm88media2@protonmail.com	4f30f2019	Collection Completed	Documents
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	213-943-3765	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials r
TBD	National Socialist Movement	BlogTalkRadio Podcast Service	516-453-6058	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
A0107	National Socialist Movement	Email	<a href="mailto:nsm88atlanta@gmail.com">nsm88atlanta@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0108	National Socialist Movement	Email	<a href="mailto:nsm88bama@gmail.com">nsm88bama@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0109	National Socialist Movement	Email	<a href="mailto:nsm88cinci@gmail.com">nsm88cinci@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0110	National Socialist Movement	Email	<a href="mailto:nsm88connecticut@gmail.com">n sm88connecticut@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0111	National Socialist Movement	Email	<a href="mailto:nsm88detroit@gmail.com">nsm88detroit@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0112	National Socialist Movement	Email	<a href="mailto:nsm88kansas@gmail.com">nsm88kansas@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0113	National Socialist Movement	Email	<a href="mailto:nsm88michigan@gmail.com">nsm88michigan@gmail.com</a>	10f18f2019	Collection Completed	Documents

A0114	National Socialist Movement	Email	<a href="mailto:nsm88monroe@gmail.com">nsm88monroe@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0115	National Socialist Movement	Email	<a href="mailto:nsm88ny@gmail.com">nsm88ny@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0116	National Socialist Movement	Email	<a href="mailto:nsm88r5@gmail.com">nsm88r5@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0117	National Socialist Movement	Email	<a href="mailto:nsm88southflorida@gmail.com">nsm88southflorida@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0118	National Socialist Movement	Email	<a href="mailto:nsm88toledo@gmail.com">nsm88toledo@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0119	National Socialist Movement	Email	<a href="mailto:nsmalabama88@gmail.com">nsmalabama88@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0120	National Socialist Movement	Email	<a href="mailto:nsmarkansas@gmail.com">nsmarkansas@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0121	National Socialist Movement	Email	<a href="mailto:nsmfresno@gmail.com">nsmfresno@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0122	National Socialist Movement	Email	<a href="mailto:nsmmaryland@gmail.com">nsmmaryland@gmail.com</a>	10f18f2019	Collection Completed	No document search term
A0123	National Socialist Movement	Email	<a href="mailto:nsmmsst88@gmail.com">nsmmsst88@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0124	National Socialist Movement	Email	<a href="mailto:nsmnc88@gmail.com">nsmnc88@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0125	National Socialist Movement	Email	<a href="mailto:nsmpor@gmail.com">nsmpor@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0126	National Socialist Movement	Email	<a href="mailto:nsmregion4hq@gmail.com">nsmregion4hq@gmail.com</a>	7f7f2020	Collection Completed	Documents
A0127	National Socialist Movement	Email	<a href="mailto:nsmvermont@gmail.com">nsmvermont@gmail.com</a>	10f18f2019	Collection Completed	Documents
A0128	National Socialist Movement	Email	<a href="mailto:nsmwestvirginia@gmail.com">nsmwestvirginia@gmail.com</a>	10f18f2019	Collection Completed	Documents

A0129	National Socialist Movement	Email	<a href="mailto:r3nsm88@gmail.com">r3nsm88@gmail.com</a>	10f18f2019	Collection Completed	Documents
TBD	National Socialist Movement	Email	<a href="mailto:chiefstaff@nsm88.org">chiefstaff@nsm88.org</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials
TBD	National Socialist Movement	Email	<a href="mailto:commander@nsm88.org">commander@nsm88.org</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is In
TBD	National Socialist Movement	Email	<a href="mailto:c_ommanderburt@nsm88.org">c_ommanderburt@nsm88.org</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
TBD	National Socialist Movement	Email	<a href="mailto:Minnesota@gmail.com">Minnesota@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsm88ky@gmail.com">nsm88ky@gmail.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is InactivefUnk
TBD	National Socialist Movement	Email	<a href="mailto:nsm88utah@gmail.com">nsm88utah@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsm88utah@gmail.com">nsm88utah@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsm88wyoming@gmail.com">nsm88wyoming@gmail.com</a>	10f18f2019	Collection pending – must bypass 2FA	iDS Cannot Proceed Further – Pas correct but 2FA bypassed. A made on 08f Defendant. collect again
TBD	National Socialist Movement	Email	<a href="mailto:nsmambassador@gmail.com">nsmambassador@gmail.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Pas incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsmchiefstagg@gmail.com">nsmchiefstagg@gmail.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is InactivefUnk

TBD	National Socialist Movement	Email	<a href="mailto:nsmcolumbus.oh@gmail.com">nsmcolumbus.oh@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Go to next address.
TBD	National Socialist Movement	Email	<a href="mailto:nsmflorida@gmail.com">nsmflorida@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Password incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsmorlando88@gmail.com">nsmorlando88@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Go to next address.
TBD	National Socialist Movement	Email	<a href="mailto:nsmregion11@gmail.com">nsmregion11@gmail.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not correct Defendant's account is Inactive/Unknown
TBD	National Socialist Movement	Email	<a href="mailto:nsmregion9hq@gmail.com">nsmregion9hq@gmail.com</a>	10f18f2019	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Password incorrect
TBD	National Socialist Movement	Email	<a href="mailto:nsmssdivision@gmail.com">nsmssdivision@gmail.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Password incorrect
TBD	National Socialist Movement	Facebook		7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials Defendant's account is Inactive
TBD	National Socialist Movement	Hotline Service	651-659-6307	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – hot line something to be collected by consultant
A0105	National Socialist Movement	Laptop	Colucci Aspire 3 Model N17Q2	7f7f2020	Collection Completed	Documents
A0104	National Socialist Movement	Mobile Device	Colucci iPhone 11 Pro Max	7f7f2020	Collection Completed	No reviewable data available from device.
TBD	National Socialist Movement	Mobile Device	Colucci iPhone XS Max	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Custodian statement was returned prior to the final Court Order

TBD	National Socialist Movement	Newsletter Service	Benchmark	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further – Password work
TBD	National Socialist Movement	Newsletter Service	Constant Contact	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials not Defendant's account is In
TBD	National Socialist Movement	Twitter	NSM88	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's never had ac
TBD	National Socialist Movement	Twitter	@ColucciBurt	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Credentials not Custodian pr iDS should al access Twitt signing in usi device. iDS w in but based accessed on t device the T appears to b not been co up. Hence, t for iDS to col
TBD	National Socialist Movement	Vkontakte (VK)	300604375	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is In
TBD	National Socialist Movement	Vkontakte (VK)	Burt Colucci	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not Defendant's account is In
TBD	National Socialist Movement	Website	<a href="http://www.nsm88.org">www.nsm88.org</a>	7f7f2020	Publicly available information was captured previously.	Documents iDS EIDA007 Defendant J. Defendant B he never had website.
TBD	National Socialist Movement	Yahoo Groups Newsletter Service	<a href="mailto:nsmworld@yahoogroups.com">nsmworld@yahoogroups.com</a>	7f7f2020	iDS Cannot Proceed Further	iDS Cannot Proceed Further Password not

						Defendant s account is In
TBD	National Socialist Movement	YouTube	NSM Media	7f7f2020	iDS Cannot Proceed Further	iDS Cannot P Further Password no Defendant st never had ac

You are correct in stating that everything that has been collected by iDS was subsequently produced and released to Plaintiffs as follows:

A0054 (Bitchute) – produced on or about 4/22/2020 as production volume NSM001

A0105 (Colucci Aspire 3 Model N17Q2) – produced on or about 7/14/2020 as production volume NSM002

A0107 – A0133 (various emails recently collected – highlighted above in green) – produced on or about 8/26/2020 as production volume NSM003

However, as you can see from the above status report excerpt, there are many social media and email accounts that iDS has not able to access for the various reasons provided.

Let us know if you have any questions.

Regards,  
Ken

Kenneth Kim  
Consultant, Discovery Services  
iDiscovery Solutions  
Mobile: 267.847.4876



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**From:** Acacia Dietz <[acacia.dietz@outlook.com](mailto:acacia.dietz@outlook.com)>  
**Sent:** Friday, October 16, 2020 2:08 AM  
**To:** Ken Kim <[kkim@idsinc.com](mailto:kkim@idsinc.com)>; Barbara Bibas <[bbibas@idsinc.com](mailto:bbibas@idsinc.com)>  
**Cc:** ESQ Edward ReBrook <[rebrooklaw@gmail.com](mailto:rebrooklaw@gmail.com)>  
**Subject:** Sines v Kessler – Discovery

[EXTERNAL SENDER]

Ken & Barbara –

The Plaintiffs have stated in a new motion to the court that they are “unable to access the social media and email accounts that NSM has disclosed” –



To my knowledge, everything that has been collected by iDS is available to the Plaintiffs for their review, correct? If so, can you please give me the date that these were made available to the Plaintiffs for their review?

Thank you,

**ACACIA DIETZ**

Legal Assistant

**THE REBROOK LAW OFFICE**

Phone: 586.696.0385

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